

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

BETH ANNE M. COLLOPY

Plaintiff,

v.

MARQUIS MANAGEMENT, LLC

Defendant.

Civil Action No. 1:22-CV-00184-SE

DECLARATION OF SCOTT WATKINS

I, Scott Watkins, having been duly sworn, depose, and state as follows:

1. I am over eighteen years of age and believe in the obligation of an oath.
2. I am the Director of Human Resources for Defendant, Marquis Management, LLC.
3. I submit this declaration in support of Defendant Marquis Management, LLC's Motion for Summary Judgment. The facts set forth in this declaration are true to my knowledge based upon my personal knowledge and/or the business records of Marquis Management, LLC.
4. Attached hereto as Tab A is a true and accurate copy of the Position Description for the position of Senior Technical Support & Network Specialist (MQSMGT-0000121).
5. Attached hereto as Tab B is a true and accurate copy of an email from Daniel Lieber to Scott Watkins regarding an offer of employment to Plaintiff dated August 28, 2020 (mqsmgt-0000453).
6. Attached hereto as Tab C is a true and accurate copy of a letter from Scott Watkins to Plaintiff regarding an offer of employment with Marquis Management, LLC dated August 28, 2020 (MARQUIS-00000765).

7. Attached hereto as Tab D is a true and accurate copy of an email from Plaintiff to Scott Watkins and Christopher Moore regarding company facilities at 40 Lowell Road dated January 14, 2021 (MARQUIS-0000932).

8. Attached hereto as Tab E is a true and accurate copy of an email from Plaintiff to Scott Watkins and Christopher Moore regarding a complaint of purported gender discrimination dated January 14, 2021 (MARQUIS-0000929).

9. Attached hereto as Tab F is a true and accurate copy of meeting notes taken by Nikolina Gobron in meetings held on January 18 and 25, 2021 (MARQUIS-0001009).

10. Attached hereto as Tab G is a true and accurate copy of an email chain between Scott Watkins and Plaintiff regarding follow-up to a prior meeting, dated January 20, 2021 (MQSMGT-0000062).

11. Attached hereto as Tab H is a true and accurate copy of a text message conversation between Christopher Moore and Plaintiff regarding administrative access rights dated January 26, 2021 (MQSMGT-0000635).

12. Attached hereto as Tab I is a true and accurate copy of an email from Michael Fruhbeis to Christopher Moore and Scott Watkins regarding confidential IT staff analysis and recommendation dated March 8, 2021 (MQSMGT-0000217).

FURTHER AFFIANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2023.

Debra Kahn

Scott Watkins

[illegible]

Then and there personally appeared Scott Watkins who subscribed the foregoing Affidavit and who swore to the truth of the statements contained therein before me, the undersigned authority on this 17 day of July, 2023.

Ezra Key
Notary Public

